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February 27, 2019

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: Compliance Filing – Annual Load Utilization  
Various Petitions for Approval of Firm Gas Transportation Agreements  
**PUBLIC DOCUMENT—TRADE SECRET DATA REDACTED**  
Docket No. PL-6580/M-19-\_\_\_\_\_

Dear Mr. Wolf:

In various Orders filed in assorted dockets regarding approval of firm transportation agreement, the Minnesota Public Utilities Commission (“Commission”) directed Greater Minnesota Transmission, LLC (“GMT”) to file an annual load utilization factor letter stating its annual load utilization factors by contract for each of its intrastate pipelines and pipeline segments. In order to reduce the administrative burden of filing the identical letter in each separate docket, GMT was directed to file its compliance letter in a new docket; hence, while this appears as an initial filing in a new docket, it is substantively a compliance filing related to each of the following dockets:

PL-6580/M-06-1063  
PL-6580/M-13-91  
PL-6580/M-13-94  
PL-6580/M-14-386  
G-022/M-14-342  
PL-6850/M-14-578  
PL-6580/M-14-1056  
PL-6580/M-15-967  
PL-6580/M-15-968  
PL-6580/M-15-1041  
PL-6580/M-16-1026  
PL-6580/M-16-936  
PL-6580/M-17-809  
PL-6580/M-17-810



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By its Order dated October 30, 2018, the Commission required GMG to meet with Commission Staff to respond to ongoing Staff questions about this report. Staff was provided with a draft of this letter on January 9, 2019 and the requisite discussion occurred on February 7, 2019 and included representatives from GMT, Commission Staff, Department Staff, and the Office of the Attorney General.

This letter constitutes the requisite annual report submitted in compliance with the Commission's Orders. **This document is a non-public document, as it contains trade secret data and GMT respectfully requests that the material remain protected from public view.** A public version, in which the trade secret information has been excised, has also been filed with the Commission. GMT maintains that the trade secret information meets the statutory criteria for protection because the information is supplied by GMT; GMT and the other party to each contract make extensive efforts to maintain the secrecy of the information and do not make the information available outside of GMT except to other parties involved in contracts and requisite regulatory agencies; and, GMT and the other party to each contract derive independent economic value from the information not being generally known to the public and competitors.

The utilization factor of the pipeline and pipeline segments utilized by project are identified in the table contained in Exhibit A, attached hereto. The table provides the percentage of capacity utilized by each segment of the respective line, identified by the corresponding contract and docket number.

With respect to the final section of the table, which reflects the utilization factor for all lines other than the Cannon Falls and Prairie Island lines, the contractual capacity and physical capacity are the same, with the assumption that gas is taken off at the end of the line, as the lines were specifically constructed to accommodate the delivery points that the customers requested.

The first two sections of the table reflect the utilization factors for the Cannon Falls and Prairie Island lines. The data for those lines reflects the contractual capacity by pipeline segment. As the Commission may recall, the line was built as a steel line to serve a power plant; and, because it is a high pressure steel line, physical capacity can be increased by up to three times contractual capacity by increasing operating pressures to the Maximum Allowable Operating Pressure of the pipeline. Those sections also reflect that the utilization factor for GMG on each of the lines exceeds 100%. While, at first blush, that may seem improbable, GMG's utilization factor results from the permissible use of excess capacity. While GMG has contracted for a particular amount of entitlement on each line, the contracts include provisions that permit the use of excess capacity on an interruptible basis if it is available, resulting in contractually approved overrun volume usage by GMG on some occasions. Such overruns generally occur primarily during grain drying season. The end result of the GMG's occasional use of excess capacity is that, in a mathematical calculation, GMG's actual use exceeds its identified contractual capacity resulting in utilization factors exceeding 100%;



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however, there is no actual risk to the supply level for GMT's other customers on the line since the incremental service is provided on an interruptible basis.

With regard to the lines that went into service during 2018, the actual volumes for those lines are based only on each line's respective actual throughput and entitlement for the period the line was in service. GMT and GMG believe that, on an annualized basis, the volumes used in the cost of service projections are reasonable.

Please do not hesitate to contact me should you have any questions or concerns or if you require additional information. My direct dial number is (507) 665-8657 and my email address is kanderson@greatermngas.com. All individuals identified on the official service lists for each respective docket have been electronically served with the same.

Sincerely,

GREATER MINNESOTA TRANSMISSION, LLC

/s/

Kristine A. Anderson  
Corporate Attorney

cc: Service List

**Exhibit A**  
**Utilization Factor Table**

**[TRADE SECRET DATA BEGINS]**

				2016 Annual	2017 Annual	2018 Annual
				Load	Load	Load
Line		Contract	Docket	Utilization	Utilization	Utilization
No.	<u>Description</u>	Parties	Number	Factors	Factors	Factors
		(1)	(2)	(3)	(4)	(5)
1	<b><u>Cannon Falls Line</u></b>					
2	Invenergy - Xcel	GMT & Xcel	06-1063			
3	Xcel - Nuclear	GMT & Xcel	13-266			
4	PIIC	GMT & Prairie Island Indian Comm.	13-91			
5	Greater MN Gas	GMT & GMG	13-94			
6	Cannon Falls Line					
7	<b><u>PIIC Line</u></b>					
8	Xcel - Nuclear	GMT & Xcel	13-266			
9	PIIC	GMT & Prairie Island Indian Comm.	13-91			
10	GMG	GMT & GMG	13-94			
11	PIIC Line					
12	<b><u>All Other Contracts, Lines &amp; Segments</u></b>					
13	Barnesville Line	GMT & Xcel	14-386			
14	Holdingford Line	GMG & Xcel	14-342	1/		
15	Ulen Line	GMT & Xcel	14-578	2/		
16	Twin Valley Mahnommen Line	GMT & Community Co-ops	14-1056			
17	Red Lake Falls line	GMT & Community Co-ops	15-967			
18	Beltrami Fertile Line	GMT & Community Co-ops	15-968			
19	Lafayette Courtland Line	GMT & United Natural Gas	15-1041			
20	Lower Sioux Line	GMT & United Natural Gas	16-1026			
21	Parkers Prairie Line/Miltona Line	GMT & Lake Region Energy Svcs.	16-936 & 17-810			
22	Dent Line	GMT & Lake Region Energy Svcs.	17-809			
	1/ Served through Greater Minnesota Gas facilities.					
	2/ The original parties to the contract were GMT and West Central Ag Services. West Central Ag subsequently assigned it to Xcel.					

**[TRADE SECRET DATA ENDS]**

# CERTIFICATE OF SERVICE

I, Kristine Anderson, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, or by depositing the same enveloped with postage paid in the United States Mail at Le Sueur, Minnesota:

**Greater Minnesota Transmission, LLC's Annual Utilization Factor Compliance Filing**  
**Docket No. \_\_\_\_\_/\_\_\_\_\_**

filed this 27<sup>th</sup> day of February, 2019.

/s/ Kristine A. Anderson  
Kristine A. Anderson, Esq.  
Corporate Attorney  
Greater Minnesota Transmission, LLC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Greater Minnesota Gas, Inc._Official Service List 2017